

DEPT. OF TRANSPORTATION DOCKETS 02 MAR 26 AM 10: 25

March 25,2002

Docket Management System U.S. Department of Transportation Docket No. TSA-2002-11334 — / O Room PL401 400 Seventh Street, SW Washington, DC 20590-0001

Dear Sir or Madame:

Thank you for the opportunity to provide comments on the final rule of 49 CFR Part 1511 – Aviation Infrastructure Security Fees (Docket No. TSA-2002-11334).

The Airports Council International – North America (ACI-NA) is a membership organization representing approximately 150 State, regional and local governing bodies that own and operate the principal airports served by scheduled air carriers in the United States and Canada. ACI-NA member airports handle approximately 98 percent of the domestic and virtually all of the international air passenger traffic and cargo traffic in North America. The Association also represents a wide variety of businesses that provide products and services to the air transportation industry.

ACI-NA requests the Transportation Security Administration (TSA) to consider seating a Security Service Fee Advisory Committee. The committee would assist the Under Secretary of Transportation for Security in meeting the mandates of Sec. 118 of the Aviation and Transportation Security Act (ATSA), while also ensuring that passenger facilitation needs and security are balanced equally in U.S. airports. ACI-NA envisions that such an advisory committee to be a stakeholder process comprised of industry, government and consumer representatives whose passengers, customers and members pay the fee. A successful model for such a committee is the Immigration and Naturalization Service's User Fee

Advisory Committee established in accordance with the provisions of the Federal Advisory Committee Act (5 U.S.C. Appendix).

Specific areas funded by the fee where stakeholder input will be valuable include: the development of a workforce analysis model, deployment schedules and best training practices for all Transportation Security Administration personnel who will become active in the U.S. aviation system.

In addition, ACI-NA asks the TSA to consider implementing a delay reporting system to record passenger through put times at security screening checkpoints, as the TSA screeners are, in part, funded by the security service fee. The report system will also allow the TSA to meet the vision of Secretary Mineta whereupon passengers would traverse through security screening checkpoints at not more than ten minutes. A model to develop the reporting system can be found with the U.S. Department of Transportation's Bureau of Transportation Statistics, which records and reports on air carrier delays.

We appreciate your consideration of these requests and welcome any questions or assistance we can provide.

Sincerely,

Dawn E. Lucini

Manager, Regulatory Affairs

Airports Council International – North America